

EXHIBIT 4

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

- - -

4 IN RE: NATIONAL : HON. DAN A.
5 PRESCRIPTION OPIATE : POLSTER
6 LITIGATION :
7 :
8 APPLIES TO ALL CASES : NO.
9 : 1:17-MD-2804
10 :
11 :

12 - HIGHLY CONFIDENTIAL -

13 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

14 VOLUME II

- - -

15 November 14, 2018

- - -

16 Videotaped deposition of
17 BRUCE L. MOSKOVITZ, M.D., taken pursuant
18 to notice, was held at the law offices of
19 Drinker Biddle & Reath, 105 College Road
20 East, Princeton, New Jersey, beginning at
21 9:17 a.m., on the above date, before
22 Michelle L. Gray, a Registered
23 Professional Reporter, Certified
24 Shorthand Reporter, Certified Realtime
25 Reporter, and Notary Public.

- - -

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4 VIDEOTAPE TECHNICIAN:

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1 APPEARANCES: (Cont'd.)

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ALSO PRESENT:

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4 VIDEOTAPE TECHNICIAN:

5 Henry Marte

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THE VIDEOGRAPHER: We are

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back on the record. Today's date

4

is November 14th, 2018. And the

5

time is 9:17 a.m.

6

Counsel, you may proceed.

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- - -

8

... BRUCE L. MOSKOVITZ, M.D.,

9

having been previously sworn, was

10

examined and testified as follows:

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- - -

12

CONTINUED EXAMINATION

13

- - -

14

BY MS. CONROY:

15

Q. Good morning, Doctor.

16

A. Good morning.

17

Q. Thank you for bringing the

18

sun back.

19

A. We don't often get it in New

20

Jersey at this time of year.

21

Q. Right. I guess we're

22

avoiding a snowstorm for a few more hours

23

I guess. What I'd like to talk about

24

first this morning is the reservoir patch

1 teenagers, whether there were concerns
2 about Nucynta that it might be different
3 from other opioids.

4 Q. And do you remember what
5 kinds of data the company received from
6 the surveillance plans that were put in
7 place for the Nucynta product?

8 A. That in general, Nucynta was
9 not a product that was sought by
10 individuals who would abuse, misuse and
11 divert -- and divert opioid products.

12 Q. And where did it rank in
13 terms of the various RADARS indexes that
14 we looked at on the slide?

15 A. Consistently at the bottom,
16 or very near the bottom of measures of
17 abuse, misuse and diversion.

18 Q. Now, when Nucynta, the
19 extended release was brought out, was
20 there -- was the extended release, the
21 class REMS in place yet?

22 A. No. It was still -- it
23 still hadn't been finalized between the
24 consortium of companies marketing

1
2 CERTIFICATE
3
4

5 I HEREBY CERTIFY that the
6 witness was duly sworn by me and that the
7 deposition is a true record of the
8 testimony given by the witness.

9 It was requested before
10 completion of the deposition that the
11 witness, BRUCE L. MOSKOVITZ, M.D., have
12 the opportunity to read and sign the
13 deposition transcript.

14
15 MICHELLE L. GRAY,
16 A Registered Professional
17 Reporter, Certified Shorthand
18 Reporter, Certified Realtime
19 Reporter and Notary Public
20 Dated: November 15, 2018
21
22
23
24

25 (The foregoing certification
26 of this transcript does not apply to any
27 reproduction of the same by any means,
28 unless under the direct control and/or
29 supervision of the certifying reporter.)
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